North Carolina State University is a land-grant university and a constituent institution of The University of North Carolina

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May 18, 2005

The National Organic Standards Board
c/o Arthur Neal
Room 4008 south Building
1400 & Independence Ave SW
Washington, DC

Dear Sir:

Re: Public Comments on Livestock Committee Recommendation for Guidance on Pasture Requirements

We, the individuals listed below, are writing in opposition to certain aspects of the contents of the section of the Committee's recommendation on "Guidance for interpretation of §205.239(a)(2) A. Organic System Plan, as written. Specifically, we object to the sentences "The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days. The organic system plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the system." Although we agree that additional guidelines are required to clarify the role of pasture, in our view, this proposed guideline is inappropriate for dairy farmers in the southern United States and could be detrimental to the development of organic dairy production in the region, for the following reasons.

- Pasture intake cannot be readily measured, rendering this guideline difficult to implement and certify.
- The term "growing season" is vague and subject to differing interpretations. Also, the term growing season is neither synonymous nor consistent with the availability of grazing to a dairy herd. There is no single "growing season" or "grazing season" in the southern United States and use of this term in the recommendation is inappropriate. In central and eastern North Carolina and areas of other states with a similar climate, a pasture-based dairy system is likely to include winter and summer annuals and cool season and warm season perennials, in some combination. Some grazing is possible during most times of year but the available pasture dry matter varies with growing conditions and the time of year. For example, there is limited or no production during the fall transition when a Bermuda grass pasture is over seeded with a winter cereal crop or/and ryegrass. Similarly, land sown in spring with a sorghum-sudan variety should not be grazed during the establishment period in the spring. The pasture system in the Delta states of Louisiana and Mississippi consists primarily of annual ryegrass in winter, followed by a summer annual such as crabgrass for summer grazing.

- In addition to the limitations imposed by plant growth, access to pasture for grazing in the southern United States is limited by a variety of extreme weather conditions throughout the year, including extreme heat and humidity, cold, wet ground conditions, and storms. The time it is prudent for cows to spend on pasture is affected by these climatic events as well as by the availability of pasture to graze. For example, abbreviated grazing in the early morning and late evening may be prudent in mid-summer conditions. Such constraints may limit dry matter intake from pasture. We note that paragraph B, which deals with temporary confinement, permits restrictions to pasture access but the existing wording does not adequately cover the situation where adverse conditions may prevail for several months of a growing season.
- We find the wording sufficiently vague as to permit some types of animals to have very limited access to pasture. We propose the wording be amended to include reference to all animals over a certain age, say 6 months, having access to pasture for a minimum number of days per year so that a higher level of access by one category or group of animals cannot be used to offset highly restricted access by other types or groups of animals.
- We would also call to the committees attention limitations to grazing imposed by farm structure. Based on the best available data we conclude that many of our existing dairy farms have limited land available for grazing because of the fragmented nature of land holdings. Where this is the case, increased reliance must be placed on conserved forages produced on land that is not available to graze.
- A final objection to this part of the proposed guideline is based on economics. Maximizing the use of pasture is not necessarily compatible with profitability. Modeling research at North Carolina State University under measured North Carolina pasture growing conditions suggests that potential farm profitability is improved with increases in annual average stocking rates of up to three cows per acre when accompanied by increased use of supplemental forages and concentrates at those higher stocking rates. Therefore we object to a statement in the guidelines that could create a significant conflict with an organic dairy farmer's need to be profitable. For example, the Piedmont region of North Carolina is the primary dairying region in the state. Land values are extremely high and $4,000 to $5,000 is a common estimate for the value of land if it were to be sold as a farm. Land for development sells for much higher sums. Under these conditions it is not economically feasible to practice land extensive pasture-based dairy farming. In general, it is necessary to practice a type of pasture-based dairy farming that relies more heavily on conserved forages and supplementary grain mixes than might be common in the Northeast or Upper Midwest.

In conclusion, we would remind the Committee there is great diversity in pasture-based dairy farming systems in the United States and the proposed guidelines should accommodate this. Furthermore, population growth is occurring in the southern region, creating a growing demand for organic dairy products. We believe that milk can be produced in the region in the spirit of the National Organic Program based on diets that include significant amounts of pasture and that rules and guidelines that encourage regional production are desirable, in part to reduce transportation costs and the associated fossil fuel demand. We do believe that, as written, the two sentences in the guidelines referred to above are detrimental to this goal and request these two sentences be replaced with the following:

"The Organic System Plan shall have the goal of optimizing the pasture component of total feed used in the system and shall provide all animals over 6 months of age access to actively growing pasture no less than 120 days per year."

We believe guidelines stating that dairy animals over a certain age should have unrestricted access to actively growing pasture on a daily basis for a minimum number of days per year (120 days) and that these pastures must maintain cover to prevent environmental degradation should be adequate to ensure an acceptable amount of pasture in the diet.

Sincerely,

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